

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

KEITH JOHNSON,)	
)	
Plaintiff,)	08 C 1526
)	
v.)	Judge St. Eve
)	
CITY OF CHICAGO, et. al.)	Magistrate Judge Schenkier
)	
Defendants.)	

**OFFICER PIERRI'S AND STINAR'S AGREED MOTION
FOR EXTENSION OF TIME IN WHICH TO ANSWER OR OTHERWISE PLEAD**

Defendants, Police Officer Lenny Pierri and Police Officer Vincent Stinar, (collectively, “Defendant Officers”), by their attorney, Marc J. Boxerman, with the agreement of Plaintiff’s attorney, respectfully request this Honorable Court for an extension of time until May 30, 2008, to answer or otherwise plead to Plaintiff’s Complaint.

In support of this motion, Defendant Officers state:

1. Plaintiff filed his complaint on March 14, 2008.
2. Officers Pierri and Stinar were each personally served with the complaint on April 21, 2008, and are thus due to answer the complaint by May 12, 2008. Marc Boxerman, the undersigned attorney, was only recently assigned to this case and has not yet had an opportunity to conduct necessary research and meet with the officers so that he may answer the complaint on their behalf.
3. Mr. Boxerman is in the process of ordering the relevant Chicago Police Department records to enable the officers to properly respond to Plaintiff’s complaint.

4. No attorney has yet filed an appearance on behalf of defendant City of Chicago.
5. This motion is the Defendant Officers' first request for an extension of time to answer or otherwise plead. Such a request will not unduly delay the resolution of this matter, nor will it prejudice Plaintiff.
6. Mr. Boxerman spoke to Josh Friedman, one of Plaintiff's attorneys, and informed him of his intention to file this motion. Mr. Friedman indicated he had no objection.

WHEREFORE, Officers Lenny Pierri and Vincent Stinar respectfully request that they be given until May 30, 2008, to answer or otherwise plead to Plaintiff's complaint.

Respectfully Submitted,

/s/ Marc J. Boxerman
MARC J. BOXERMAN
Senior Counsel
Attorney for the Defendant Officers

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CERTIFICATE OF SERVICE

I certify that on May 2, 2008, I caused true and correct copies of Officer Pierri's and Stinar's Agreed Motion for Extension of Time in which to Answer or Otherwise Plead and the corresponding Notice of Motion to be served upon the persons named in the Notice of Motion, a "Filing User" pursuant to ECF, in accordance with the rules of electronic filing of documents.

/s/ Marc J. Boxerman
MARC J. BOXERMAN